

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
2024 MAR 28 PM 2:10
OFFICE OF THE CLERK

UNITED STATES DISTRICT COURT

for the
District of Nebraska
Nebraska Division

Tipkwan Ajawin Ajang

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Mrs Tabitha Andrew Ajackog

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Case No.

8:24CV113

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☐ No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS (Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Tipkwan Ajawin Ajang		
Address	6312 Park lane Drive		
	Omaha	NE	68104
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Douglas County		
Telephone Number	(402) 444-7449		
E-Mail Address	NA		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	Tabitha Andrew Ajackog		
Job or Title (if known)	NA		
Address	4214 22nd Ave NW		
	Rochester	MN	55906
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Olmsted County		
Telephone Number	NA		
E-Mail Address (if known)	NA		
<input checked="" type="checkbox"/> Individual capacity <input type="checkbox"/> Official capacity			

Defendant No. 2

Name			
Job or Title (if known)			
Address			
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number			
E-Mail Address (if known)			
<input type="checkbox"/> Individual capacity <input type="checkbox"/> Official capacity			

Defendant No. 3

Name _____

Job or Title (if known) _____

Address _____

City _____

State _____

Zip Code _____

County _____

Telephone Number _____

E-Mail Address (if known) _____

☐

Individual capacity

☐

Official capacity

Defendant No. 4

Name _____

Job or Title (if known) _____

Address _____

City _____

State _____

Zip Code _____

County _____

Telephone Number _____

E-Mail Address (if known) _____

☐

Individual capacity

☐

Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐Federal officials (a *Bivens* claim)☐

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials? - Defendant (s) have circulated voice recording messages of defamation of character and false statements that stated bad names call and verbal harmed both, my wife's and my family reputation. Defendant (s) sent these a false and harmful statement about my wife's family tranishing the personal character of my mother in law causing altercation between three families (Defendant's family on one side against my inlaw and my family on otherside) in South Sudan.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?
These was on social media deformation live talk and voice record broadcasting.
- B. What date and approximate time did the events giving rise to your claim(s) occur?
The Event occured on social media and voice record message broadcast on different days of November 2023, date and approximate time Nov. 2023 11:20 AM
- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*
- Mrs. Tabitha (Defendant) called me on face book messenger after that she started to send an insult about my wife with personal deformation attacking character and unjustly hurt her reputation of our families including privacy of medical information about my stepson elegits that my son is under ongoing mental disorder and stress and taking mental health medication. As a minor, Mrs. Tabitha (Defendant) violated the confendentiality and pravacy of my stepson.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Since I have been a personal of figure to my community, Pashodo Community Mutual Assistance Association (PCMA) in the USA, Mrs. Tabitha (Defendant) has been doing these defaming to my families (my wife and including my Mather-in-Law) telling lies to trash our reputation and look like disgraced people in the community. These social media deformation voice recording has been sent to me and spreaded all over so the friends of Defendant disgracing, disrespectful and are malicious my family (Mother-in-Law) and to my wif.

Mrs. Tabitha (Defendant) disclosed medical information about my stepson elegits that my son is under ongoing mental disorder and stress and taking mental health medication. These rumors come in forms of insults and abusive behaviors of her hit speech toward my wife that cause my wife emotional distress, anxiety, mental anguish, and loss of enjoyment of life as a household.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Mrs. Tabitha (Defendant) should be brought to court in order she have to stop recording and sending scandalous statements about my family now and in the future.

Mrs. Tabitha (Defendant) allegations and her act of defarmation to my wife's family is a targate to my family reputation are not true and baseless information causing painful burden to our families, she need to be punish by law so no one would repead her act any memmber in community, Pashodo Community Mutual Assistance Association (PCMA).

Mrs. Tabitha (Defendant) should be held responsible for an anxiety disorder, sleepless time, and pain troma from suffering of my mather in law characte assassination to the enire family reputation.

Mrs. Tabitha (Defendant) sent me all these recording voice messages as a deliberate and sustained effort to damage the reputation and credibility of my family and the in law's in the community. She needs to admit his lies and guilt and make her apology to the Pashodo Community Mutual Assistance Association (PCMA).

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

02/08/2024

Signature of Plaintiff

Printed Name of Plaintiff

Tipkwan Ajawin Ajang

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address